

**IN THE UNITED STATE BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF:)	CHAPTER 11
)	
Advanced Roofing & Woodworking, Inc.)	CASE NO. 15-27325
)	
Debtor.)	Judge Jack Schmetterer
)	

NOTICE OF MOTION

TO: Debtor, U.S. Trustee, Creditors and Parties in Interest

PLEASE TAKE NOTICE that on March 24, 2016, at 10:30 am., I shall appear before the Honorable Judge Jack B. Schmetterer, in Courtroom 682, of the Dirksen Federal Building, 219 S. Dearborn Street, Chicago, Illinois, and then and there present Motion for Entry of Order of Substantial Consummation and Final Decree, a copy of which is herewith served upon you and at which time and place you may appear and be heard.

ADVANCED ROOFING & WOODWORKING, INC.

By: Teresa L. Einarson
One of its attorneys.

CERTIFICATE OF SERVICE

I, Teresa L. Einarson, an attorney, certify that a copy of the above referenced document was served upon the parties to whom this Notice is directed either electronically or by placing copies in envelopes and depositing the envelopes in the U.S. mail, first class mail, proper postage prepaid, on March 2, 2017.

By: Teresa L. Einarson

Teresa L. Einarson
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1200 Roosevelt Rd, Ste 150
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)	Chapter 11
)	
ADVANCED ROOFING &)	Case No. 15-27325
WOODWORKING, INC.)	
Debtor.)	Honorable Jack B. Schmetterer

MOTION FOR ENTRY OF ORDER OF SUBSTANTIAL CONSUMMATION
AND FINAL DECREE

Advanced Roofing & Woodworking, Inc. (“Advanced”), by and through its attorneys, Thomas & Einarson, Ltd., moves this Honorable Court for entry of an order of substantial consummation and final decree closing the case pursuant to 11 U.S.C. 1101(2), 11 U.S.C. 350(a) and FRBP 3022. In support of this Motion, Advanced states:

1. On December 22, 2016, this Honorable Court entered an order confirming the Debtor’s Plan of Reorganization (“Plan”). [Docket #234].

2. Section 11 USC 1101(2) provides that:

(2) “substantial consummation” means

(A) transfer of all or substantially all of the property proposed by the plan to be transferred;

(B) assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and,

(C) commencement of distribution under the plan.

3. The Plan provides that “Charles Hankins shall remain the sole shareholder, officer and director of the reorganized debtor and equipment existing on the Petition Date, and still in the possession of Debtor, shall be transferred to the reorganized debtor to allow it to continue operations.” (Plan, pg. 5).

4. All equipment has been transferred to the reorganized debtor, Advanced Roofing & Woodworking, Inc.; Advanced Roofing & Woodworking, Inc. is in possession of all assets; and Advanced Roofing & Woodworking, Inc. has assumed management, control and administration of all of the property dealt with by the Plan.

5. Advanced Roofing & Woodworking, Inc. has commenced distribution under the Plan by making the following required payments:

a.) payment of awarded compensation to Springer Brown, LLC in full (US Bank Checking - check #3436 dated 12/31/2016);

b.) payment of the 4th quarter 2016 U.S. Trustee Fee in full (US Bank Checking – check #3551 dated 1/27/2017);

c.) payment of a portion, by agreement, of awarded compensation to Thomas & Einarson, Ltd. (US Bank Checking – check #3414 dated 12/31/2016);

d.) the first quarterly payments to Unsecured Priority Tax Claimants, IRS, IDOR and IDES on January 27, 2016 (see attached Plan Payment Account check register);

e.) the first post-confirmation monthly payments to Class 2 and 3 secured claimant Union National Bank (US Bank Checking – check # 3490 dated 1/10/2017 and check #3548 dated 1/27/2017).;

f.) the first quarterly payment to Class 4 Secured Claimant IRS on January 27, 2017 (See attached Plan Payment Account check register);

g.) payment of the IDES \$17,910 Class 5 Set-Off Claim by the Illinois Comptroller in accordance with the terms of the Plan; and,

h.) the first quarterly payment of Class 6 Unsecured Claims on January 27, 2017 (See attached Plan Payment Account check register).

6. Pursuant to 11 USC 1101(2), the Plan has been substantially consummated and substantially all of the provisions of the Plan have been complied with and only ministerial matters are yet to be performed.

7. Accordingly, Advanced Roofing & Woodworking, Inc., requests that this Court enter an order of substantial consummation and final decree closing the case pursuant to 11 USC 350 and FRBP 3022 with the Court to retain jurisdiction to reopen the case to afford relief to Debtor or Creditors for cause, including failure of Advanced Roofing & Woodworking, Inc. to complete its ministerial duty to make plan payments.

WHEREFORE, Advanced Roofing & Woodworking, Inc. respectfully requests that this Court enter an order of substantial consummation; a final decree closing the case; and, any further relief this Court deems just and appropriate.

ADVANCED ROOFING & WOODWORKING, INC.

By: Teresa L. Einarson
One of its attorneys

Teresa L. Einarson
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1200 Roosevelt Road, Suite 150
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Tel. (630) 562-2280

Advanced Roofing & Woodworking Inc

1/30/2017 8:45 AM

Register: US Plan Payment Account

From 01/01/2017 through 01/30/2017

Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Payment	C	Deposit	Balance
01/27/2017			Roof to disbursement a...	Deposit			40,000.00	40,100.00
01/27/2017	101	BK AI Repair	Accounts Payable	Class 6 Claim I...	11.69			40,088.31
01/27/2017	102	BK Air Gas	Accounts Payable	class 6 claim in...	65.28			40,023.03
01/27/2017	103	BK Amb Roofing	Accounts Payable	class 6 claim in...	892.50			39,130.53
01/27/2017	104	BK American Interst...	Accounts Payable	class 6 claim in...	587.60			38,542.93
01/27/2017	105	BK Anthony Kubon	Accounts Payable	class 6 claim in...	1,494.36			37,048.57
01/27/2017	106	BK Auto Owners	Accounts Payable	class 6 claim in...	515.52			36,533.05
01/27/2017	107	BK AXA Equitable	Accounts Payable	class 6 claim in...	120.00			36,413.05
01/27/2017	108	BK Bartlett Chamber	Accounts Payable	class 6 claim in...	23.30			36,389.75
01/27/2017	109	BK Call One	Accounts Payable	class 6 claim in...	87.45			36,302.30
01/27/2017	110	BK Capital One Bank	Accounts Payable	class 6 claim in...	301.93			36,000.37
01/27/2017	111	BK Chicago Flamepr...	Accounts Payable	class 6 claim in...	69.24			35,931.13
01/27/2017	112	BK Cintas	Accounts Payable	class 6 claim in...	90.59			35,840.54
01/27/2017	113	BK Com Ed	Accounts Payable	class 6 claim in...	515.67			35,324.87
01/27/2017	114	BK Comcast	Accounts Payable	class 6 claim in...	30.31			35,294.56
01/27/2017	115	BK Custom Gutter	Accounts Payable	class 6 claim in...	70.00			35,224.56
01/27/2017	116	BK Dallas National	Accounts Payable	class 6 claim in...	28.93			35,195.63
01/27/2017	117	BK Detection System...	Accounts Payable	class 6 claim in...	142.80			35,052.83
01/27/2017	118	BK Edgerton & Edge...	Accounts Payable	class 6 claim in...	156.60			34,896.23
01/27/2017	119	BK Firestone Buildin...	Accounts Payable	class 6 claim in...	72.80			34,823.43
01/27/2017	120	BK First Data	Accounts Payable	class 6 claim in...	76.36			34,747.07
01/27/2017	121	BK First Insurance F...	Accounts Payable	class 6 claim in...	870.09			33,876.98
01/27/2017	122	BK Gemini Insuranc...	Accounts Payable	class 6 claim in...	650.00			33,226.98
01/27/2017	123	BK Hackneys Classic...	Accounts Payable	class 6 claim in...	55.00			33,171.98
01/27/2017	124	BK Heritage Harley	Accounts Payable	class 6 claim in...	130.94			33,041.04
01/27/2017	125	BK HS Heating & C...	Accounts Payable	class 6 claim in...	220.00			32,821.04
01/27/2017	126	BK Hytech Products	Accounts Payable	class 6 claim in...	260.33			32,560.71
01/27/2017	127	BK IDES Benefit Pa...	Accounts Payable	Priority unsecu...	2,922.96			29,637.75
01/27/2017	128	BK IL Dept of Rev	Accounts Payable	class 6 claim in...	20.55			29,617.20
01/27/2017	129	BK IRS Secured Deb...	Accounts Payable	Class 4 Claim ...	15,978.45			13,638.75
01/27/2017	130	BK IRS Unsecured P...	Accounts Payable	Priority Unsecu...	5,407.47			8,231.28
01/27/2017	131	BK J&W Painting	Accounts Payable	class 6 claim in...	53.00			8,178.28
01/27/2017	132	BK Kropp Equipment	Accounts Payable	class 6 claim in...	109.70			8,068.58
01/27/2017	133	BK IL dept of rev BK ...	Accounts Payable	Priority unsecu...	173.43			7,895.15
01/27/2017	134	BK Lux Security Sys...	Accounts Payable	class 6 claim in...	28.80			7,866.35
01/27/2017	135	BK M&A Truck Rep...	Accounts Payable	class 6 claim in...	1,376.57			6,489.78
01/27/2017	136	BK Manufacturer Ne...	Accounts Payable	class 6 claim in...	17.40			6,472.38
01/27/2017	137	BK Marie Kubon	Accounts Payable	class 6 claim in...	1,469.96			5,002.42
01/27/2017	138	BK Marks Machine ...	Accounts Payable	class 6 claim in...	55.21			4,947.21
01/27/2017	139	BK Mary Kuly	Accounts Payable	class 6 claim in...	175.00			4,772.21

Advanced Roofing & Woodworking Inc

1/30/2017 8:45 AM

Register: US Plan Payment Account

From 01/01/2017 through 01/30/2017

Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Payment	C	Deposit	Balance
01/27/2017	140	BK McMaster Carr S...	Accounts Payable	class 6 claim in...	89.42			4,682.79
01/27/2017	141	BK Menards	Accounts Payable	class 6 claim in...	65.94			4,616.85
01/27/2017	142	BK Nicor	Accounts Payable	class 6 claim in...	25.60			4,591.25
01/27/2017	143	BK Novo Point	Accounts Payable	class 6 claim in...	177.66			4,413.59
01/27/2017	144	BK Oakbrook Office ...	Accounts Payable	class 6 claim in...	92.21			4,321.38
01/27/2017	145	BK Penske Truck	Accounts Payable	class 6 claim in...	192.67			4,128.71
01/27/2017	146	BK Pitney Bowes	Accounts Payable	class 6 claim in...	146.54			3,982.17
01/27/2017	147	BK Plewa Developers	Accounts Payable	class 6 claim in...	70.00			3,912.17
01/27/2017	148	BK Pro Fastening Sy...	Accounts Payable	class 6 claim in...	56.00			3,856.17
01/27/2017	149	BK Purchase Power	Accounts Payable	class 6 claim in...	196.26			3,659.91
01/27/2017	150	BK Residential Steel	Accounts Payable	class 6 claim in...	540.00			3,119.91
01/27/2017	151	BK Runz Remodeling	Accounts Payable	class 6 claim in...	306.63			2,813.28
01/27/2017	152	BK Safety Services	Accounts Payable	class 6 claim in...	52.50			2,760.78
01/27/2017	153	BK STA Tax Defense	Accounts Payable	class 6 claim in...	350.00			2,410.78
01/27/2017	154	BK Sustainable Light...	Accounts Payable	class 6 claim in...	89.66			2,321.12
01/27/2017	155	BK The Hartford Gro...	Accounts Payable	class 6 claim in...	320.60			2,000.52
01/27/2017	156	BK Travelers Insuran...	Accounts Payable	class 6 claim in...	217.50			1,783.02
01/27/2017	157	BK Trs Recovery	Accounts Payable	class 6 claim in...	332.56			1,450.46
01/27/2017	158	BK Yellow Pages	Accounts Payable	class 6 claim in...	158.40			1,292.06